

Applicant : John W. Worthington
Serial No. : 10/674,633
Filed : September 29, 2003
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Attorney's Docket No.: 07844-600001 / P553

REMARKS

Claims 1-32 were pending as of the action mailed on June 17, 2005.

Claims 1-2, 6, 10-13, 15-18, 22, 26-29 and 31-32 are being amended.

Reexamination and reconsideration of the action are requested in light of the foregoing amendments and the following remarks.

Section 112

Claims 2 and 18 were rejected on as allegedly failing to comply with the enablement requirement. The applicant respectfully traverses the rejection.

Claims 2 and 18 are amended along with the claims from which they depend to clarify their meaning (e.g., to clarify the difference between *distortion vectors* and *tool vectors*). As amended, claims 2 and 18 recite applying the warping tool to an image, where the application of the warping tool defines one or more distortion vectors within the image based on the region of influence and the tool vectors. Claims 2 and 18 are supported by the specification at least at page 9, lines 16-25 and page 12, lines 2-22.

The applicant also suggests that the Examiner's statement, "...the shape of the warping tool dictates the points of an image that are to be included in the warping tool," is misleading. A more accurate description of the influence of the shape of the warping tool vis-à-vis the image can be found in the specification at page 4, lines 2-12.

Section 102

Claims 1-2, 6-9, 17-18, and 22-25 were rejected as allegedly anticipated by U.S. Patent Application Publication US2004/0056871 ("Milliron"). The applicant respectfully traverses the rejection.

Milliron discloses techniques for deforming computer graphics. *See* abstract. A warp designer establishes a set of source and target features and a parameter set for controlling a deformation. *See* abstract and ¶¶75-77. This information defines a transformation that maps a source coordinate frame to a target coordinate frame. *See* ¶93.

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As amended, claim 1 recites a method that includes receiving user input specifying a warping tool, where the warping tool has a tool perimeter that has a shape and a size. The warping tool also has one or more associated tool vectors, where each of the tool vectors originates at a mesh point defined by a tool mesh associated with the warping tool. The user input specifies one or more of the shape of the tool perimeter, the tool mesh, and the associated tool vectors. Movement of the warping tool within an image is controlled by user input, and the warping tool can be applied to the image, where the region of influence of the warping tool is defined by the tool perimeter.

The applicant respectfully submits that the user-specified warping tool of the present invention is different from the user-specified deformation of Milliron. For reference, warping tools are discussed in the specification at least at page 1, lines 8-15; page 4, lines 2-12; and page 9, lines 4-25. Milliron does not disclose or suggest a warping tool where user input specifies one or more of a shape of a tool perimeter, a tool mesh, and one or more associated tool vectors, all of which the warping tool has.

For at least this reason, claim 1 and dependent claims 2 and 6-9 are allowable over Milliron. Independent claim 17 includes limitations similar to those of claim 1 and is allowable, along with dependent claims 18 and 22-25, for at least the same reason.

Section 103

Claims 3-5, 10-16, 19-21, and 26-32 were rejected as allegedly unpatentable over Milliron in view of U.S. Patent Application Publication US2002/0089500 ("Jennings"). The applicant respectfully traverses the rejection.

Jennings discloses a method for modifying a virtual object on a computer. *See abstract.* A portion of a volumetric representation of the object is converted into an alternative representation to allow a user to change the shape of the object. *See abstract.*

Jennings, alone or in combination with Milliron, does not disclose or suggest a warping tool where user input specifies one or more of a shape of a tool perimeter, a tool mesh, and one or more associated tool vectors, all of which are included in the warping tool.

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For at least this reason, dependent claims 3-5, 10-16, 19-21, and 26-32 are allowable over the combination of Milliron and Jennings.

Conclusion

For the foregoing reasons, the applicant submits that all the claims are in condition for allowance.

By responding in the foregoing remarks only to particular positions taken by the examiner, the applicant does not acquiesce in other positions that have not been explicitly addressed. In addition, the applicant's arguments for the patentability of a claim should not be understood as implying that no other reasons for the patentability of that claim exist.

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Respectfully submitted,

Date: _____

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